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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

HYE LIN SHIN) CIVIL ACTION NO. 08-0022
)
Plaintiff)
)
v.) DEFENDANT'S CASE
) MANAGEMENT SETTLEMENT
YOU RIM CORPORATION)
)
Defendant) Date: June 9, 2008
_____) Time: 8:30 a.m.

Comes now defendant who submits the following proposed Case

Management Conference Statement:

(a) Service of Process:

Defendant does not contest service.

(b) Jurisdiction and Venue:

Defendant disputes subject matter jurisdiction and venue.

(c) Track Assignment:

Standard

(d) Anticipated motions:

The motions defendant anticipates filing include, but are not limited to the following:

1. Motion to amend answer;
2. Discovery motions;
3. Summary judgment motions

(e) Anticipated Discovery and Limitation on Discovery:

1. Interrogatories will be served upon plaintiff.
2. A request for Production of Documents will be served upon plaintiff.
3. A Request for Admissions will be served upon plaintiff.
3. Defendant anticipates taking, at least, the deposition of plaintiff, Scarlet Hyun Shin, each defendant. Additional depositions may be necessary of

other persons who are later learned to possess discoverable knowledge.

(f) Further proceedings:

Defendant leaves the setting of the proceedings to the court.

(g) Special Procedures:

Not necessary.

(h) Modification of the standard pre-trial procedures:

No modifications necessary.

(i) Settlement prospects:

Defendant believes reasonable settlement may be possible.

(j) Limitation of issues:

No limitation is necessary, at this time.

(k) Setting of dates:

1. Motions to amend and supplement pleadings filed on or before September 30,

2008;

2. All discovery served so as to be completed by February 2, 2009;
3. Discovery motions filed on or before February 12, 2009;
4. Settlement Conference on November 20, 2008;
3. All dispositive motions filed so as to be heard on or before April 23, 2009;
4. Final Settlement Conference on April 24, 2009;
5. Joint pre-trial order May 4, 2009
6. Final Pre-trial conference May 13, 2009; and
4. Trial date of May 18, 2009 at 9:00 a.m.

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By: _____/s/_____
G. Anthony Long